

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Hagg Press, Inc.  
Attn: Mr. David Cameron  
1165 Jansen Farm Court  
Elgin, Illinois 60123

Application No.: 95070065

I.D. No.: 089438AFT

Applicant's Designation: PRESSROOM

Date Received: October 17, 2003

Subject: Lithographic Presses

Date Issued:

Expiration Date:

Location: 1165 Jansen Farm Court, Elgin

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of 15 lithographic printing presses (Macroni video jet, Xerox docutech 135, Xerox I Gen 3, 8/C Komori SP, 2/C Super-web nonheatset web, 4/C automation "J" nonheatset web, 1/C Heidelberg, 2/C Heidelberg, 4/C Komori, 2/C Miehle, 6/C Komori, 2/C Ryobi, 6/C Komori, 4/C Muller-Martini with UV dryers, and 4/C Roland) pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year of volatile organic material (VOM)). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. Emissions of volatile organic material (VOM) shall not exceed the following limits:

VOM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
1	9.4

These limits are based on all presses being sheetfed or non-heatset, 95% retention of VOM in all inks, and maximum material usage and VOM contents. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 3a. This permit is issued based upon the lithographic printing presses being exempt from the requirements of 35 Ill. Adm. Code Part 218, Subpart H: Printing and Publishing, Section 218.407: Emission and Control Requirements for Lithographic Printing Lines on and After March 15, 1996. This is consequence of the combined daily emission rate of volatile organic materials (VOM) from subject presses never exceeding an applicability threshold of 100 lb/day (including solvents used for cleanup operations associated with the lithographic printing line(s)) established by Section 218.405(d) (2) and determined in accordance with Section 218.411(a) (1) (B) .
- b. Compliance with the daily limit shall be determined by calculations which demonstrate that combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source never exceed 100 lbs/day before the use of capture systems and control devices, as follows:
  - i. To calculate daily emissions of VOM, the owner or operator shall determine the monthly emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) and divide this amount by the number of days during that calendar month that printing lines at the source were in operation;
  - ii. To determine the VOM content of the inks, fountain solution additives and cleaning solvents, the tests methods and procedures set forth in 35 Ill. Adm. Code Section 218.409(c) shall be used;
  - iii. To determine VOM emissions from inks used on lithographic printing line(s) at the source, an ink emission adjustment factor of 0.05 shall be used in calculating emissions from all non-heatset inks, and a factor of 0.80 shall be used in calculating emissions from all heatset inks to account for VOM retention in the substrate. The VOM content of the ink, as used, shall be multiplied by this factor to determine the amount of VOM emissions from the use of ink on the printing line(s); and
  - iv. To determine VOM emissions from fountain solutions and cleaning solvents used on lithographic printing line(s) at the source, no retention factor is used.
- 4a. The Permittee shall maintain purchase and inventory records of the following:
  - i. The name, identification, and VOM content of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;
  - ii. Inventory records from the beginning and end of each month indicating the total volume of each fountain solution additive, lithographic ink, and cleaning solvent to be used on any lithographic printing line at the source;

- iii. Monthly purchase records for each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line at the source;
  - iv. A daily record which shows whether a lithographic printing line at the source was in operation on that day;
  - v. The total VOM emissions at the source each month, determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated each month based on the monthly inventory and purchase records for the lithographic printing lines;
  - vi. The VOM emissions in lbs/day for the month for the lithographic printing lines;
5. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
6. The Permittee shall maintain monthly records of the following items:
- a. Names and amounts of inks, fountain solutions, and clean-up solvents used (gallons/month);
  - b. VOM and HAP content of materials in item (a) (lb/gallon or wt. %);
  - c. The number of days during that calendar month that lithographic printing lines were in operation;
  - d. VOM emission calculations for lithographic printing presses to demonstrate an exemption level of the daily VOM emissions performed pursuant to the procedures of Section 218.411(a) (1) (B) (no VOM retention of cleaning solvents is allowed); and
  - e. Total VOM emission calculations (tons/month and tons/year).
7. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

8. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
9. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

10. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
  - a. Names and amounts of inks, fountain solutions, and clean-up solvents used (gallons/month);
  - b. VOM and HAP content of materials in item (a) (lb/gallon or wt. %);
  - c. The number of days during that calendar month that lithographic printing lines were in operation;
  - d. VOM emission calculations for lithographic printing presses to demonstrate an exemption level of the daily VOM emissions performed pursuant to the procedures of Section 218.411(a) (1) (B) (no VOM retention of cleaning solvents is allowed); and
  - e. Total VOM emission calculations (tons/month and tons/year).

If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

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If you have any questions on this, please call Randy Solomon at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:RBS:psj

cc: Illinois EPA, FOS Region 1  
Illinois EPA, Compliance Section  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the lithographic printing presses operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 25 tons per year for volatile organic material (VOM)) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

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These limits are based on all presses being sheetfed or non-heatset, 95% retention of VOM in all inks, and maximum material usage and VOM contents. Compliance with annual limits shall be determined from a running total of 12 months of data.

2. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

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